

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

NAPLETON'S ARLINGTON HEIGHTS MOTORS, INC. f/k/a NAPLETON'S PALATINE MOTORS, INC. d/b/a NAPLETON'S ARLINGTON HEIGHTS CHRYSLER DODGE JEEP RAM, an Illinois corporation; NAPLETON'S RIVER OAKS MOTORS, INC. d/b/a NAPLETON'S RIVER OAKS CHRYSLER DODGE JEEP RAM, an Illinois corporation; CLERMONT MOTORS, LLC d/b/a NAPLETON'S CLERMONT CHRYSLER DODGE JEEP RAM, an Illinois limited liability company; NAPLETON'S NORTH PALM AUTO PARK, INC. d/b/a NAPLETON'S NORTHLAKE CHRYSLER DODGE JEEP RAM, an Illinois corporation; NAPLETON ENTERPRISES, LLC d/b/a NAPLETON'S SOUTH ORLANDO CHRYSLER DODGE JEEP RAM, an Illinois limited liability company; NAPLETON'S MID RIVERS MOTORS, INC. d/b/a NAPLETON'S MID RIVERS CHRYSLER DODGE JEEP RAM, an Illinois corporation; NAPLETON'S ELLWOOD MOTORS, INC. d/b/a NAPLETON'S ELLWOOD CHRYSLER DODGE JEEP RAM, an Illinois corporation,

Plaintiffs,

v.

FCA US LLC, a Delaware corporation,

Defendant.

Case No. 1:16-cv-00403-VMK-SMF

AGREED MOTION TO EXTEND DISCOVERY CUT-OFF DATE

The parties agree that the discovery cut-off of May 5, 2017 should be extended at least six months to enable them to develop their respective cases.

This Court lifted the stay of discovery on October 4, 2016. After this Court lifted the stay, the parties proceeded to engage in discovery. Both sides have outstanding discovery responses and continue to negotiate resolution of discovery issues. For this reason, both sides agree that a six month extension is warranted.

This Court entered a scheduling order on October 13, 2016 (Docket # 63). The parties would request that all of the dates in that order be extended accordingly as follows:

Event	Old Date	New Date
End of Fact Discovery	May 5, 2017	November 3, 2017
End of Expert Discovery	July 28, 2017	January 25, 2018
Dispositive Motions	August 25, 2017	February 22, 2018
Replies to dispositive motions	September 22, 2017	March 22, 2018
Responses to dispositive motions	October 13, 2017	April 12, 2018
Motions in Limine	December 22, 2017	June 21, 2018
Jury Trial	January 15, 2018	July 16, 2018

Counsel for Plaintiffs, Jeffery M. Cross, communicated with Caitlin Monahan, one of the counsel for Defendants, and she agreed with this joint request.

For the foregoing reasons, Plaintiffs respectfully request that this Court extend discovery until November 3, 2017 and adjust the other dates as set forth above.

Dated: March 30, 2017

Respectfully submitted,

The Napleton Plaintiffs

By: /s/ David C. Gustman

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CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that he caused the foregoing Plaintiffs' Motion to Extend Discovery Cut-off on counsel of record via CM/ECF system March 30, 2017.

/s/ Jeffery M. Cross

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